

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN**

In re:

EDWARD ALLEN KEETER,

Debtor.

\_\_\_\_\_  
EDWARD ALLEN KEETER,

Plaintiff,

v.

SOUTHWEST MICHIGAN ASSET  
MANAGEMENT, LLC, MICHAEL T.  
GARRISON, and KYLE M. HAMMOND,

Defendants.

Case No.: 23-01759

Chapter 13

Hon. Scott W. Dales

Filed: 8/1/2023

Adv. Pro No.: 24-80076-swd

---

**DEFENDANT KYLE M. HAMMOND’S  
RESPONSE TO PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT**

DEFENDANT Kyle M. Hammond (“Hammond”), by and through his undersigned attorneys, states that his response to Plaintiff’s *Motion for Summary Judgment* [Docket No. 36] (the “Motion”) as follows:

1. Plaintiff’s Motion asks this Court to enter judgment in favor of Plaintiff and against Defendant Southwest Michigan Asset Management, LLC (“SMAM”) to avoid the transfer of Plaintiff’s property to SMAM.
2. It does not appear that the Motion seeks relief or remedy against Mr. Hammond, or otherwise addresses any of Plaintiff’s claims against Mr. Hammond.

However, to the extent that the Motion does ask that this Court provide relief or remedy for Plaintiff and against Mr. Hammond, Mr. Hammond objects because the Motion does not provide any basis for such relief.

WHEREFORE, Defendant Kyle M. Hammond requests that this Court deny the Motion to extent it requests any relief or remedy against Mr. Hammond.

Respectfully submitted,  
MADDIN HAUSER ROTH & HELLER, PC

/s/ David M. Eisenberg  
DAVID M. EISENBERG (P68678)  
Attorneys for Kyle M. Hammond  
One Towne Square, Fifth Floor  
Southfield, MI 48076  
248-354-4030  
[deisenberg@maddinhauser.com](mailto:deisenberg@maddinhauser.com)

DATED: July 14, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2025, the foregoing document was electronically filed with the Clerk of the Court using the Court's electronic filing system, which will send notification of such filing to those who are currently on the list to receive e-mail notices for this case.

/s/ David M. Eisenberg  
David M. Eisenberg (P68678)